

THOMAS SARANELLO

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

COPY

CARMELO MILLAN,	:	NO. 07CIV3769
Individually and on	:	
Behalf of All Other	:	
Persons Similarly	:	
Situated,	:	
Plaintiff	:	
	:	
vs.	:	
	:	
CITIGROUP, INC., and	:	
CITIGROUP TECHNOLOGY,	:	
INC.,	:	
Defendants	:	

DEPOSITION OF THOMAS G. SARANELLO

Taken in the Locks Law Firm, 110
East 55th Street, 12th Floor, New York, New York, on
Thursday, February 7, 2008, commencing at 11:30 a.m.
before Sally A. Slifer, CSR, Registered Merit
Reporter, Certified Realtime Reporter.

APPEARANCES:

LOCKS LAW FIRM

By: JANET C. WALSH, ESQ.

110 East 55th Street, 12th Floor

New York, NY 10022

-- For the Plaintiff

APPEARANCES: (Continued)

MORGAN LEWIS

By: SARAH E. BOUCHARD, ESQ.

SARAH E. PONTOSKI, ESQ.

1701 Market Street

Philadelphia, PA 19103

-- For the Defendant

1	2001 Performance Review	78
2	Bates stamped CTI 00001249 - 1255	102
3	Bates stamped CTI 000326 - 329	120
4	Bates stamped CTI 0000330 - 333	130
5	Bates stamped CTI 00001476- 1479	135
6	Bates stamped CTI 00001484- 1485	138
7	Bates stamped CTI 00001490 - 1491	139
8	Bates stamped CTI 00001262 - 1356	143
	EXHIBITS NOT IN CUSTODY OF REPORTER	
	00001262 - 1356	143

1 MS. BOUCHARD: We would like the
2 witness to read and sign the deposition.

3 What that means is once the court
4 reporter gets the transcript to us you will have an
5 opportunity to review it to make sure everything is
6 taken down correctly.

7 Okay?

8 MR. SARANELLO: Okay.

9 THOMAS G. SARANELLO, having been
10 duly sworn, was examined and testified as follows:

11 * * *

12 EXAMINATION

13 MS. WALSH:

14 Q. Good morning, Mr. Saranello. My name is
15 Janet Walsh. I am an attorney representing the
16 plaintiff in this action. I will be asking you some
17 questions today on the record. As you can see we have
18 a court reporter here. So I wanted to go over some
19 ground rules with you.

20 The first thing is have you ever
21 given deposition testimony before today?

22 A. No.

23 Q. Have you ever testified in court before?

24 A. No.

25 Q. As I told, you the court reporter is here.

1 So some is basic rules we have to follow is because
2 she's taking down everything we say.

3 I am going to ask you to allow me to
4 finish the question, and I will also allow you to
5 finish your answer. Frequently when we are speaking
6 with each other, we can anticipate what we are going
7 to say, so we have a tendency to kind of cut off the
8 end of what the other person is saying. So if you can
9 remember to allow me to finish.

10 The second thing is if you can give
11 verbal responses as opposed to a shake of the head or
12 a nod of the head or an uh-huh, again something we can
13 understand and read back on the transcript.

14 If you don't understand any question
15 that I have asked you, I am going to ask if you can
16 tell me that, and I will rephrase the question for you
17 or I will repeat it for you.

18 If you don't let me know that, I am
19 going to assume you heard and understood the question.

20 If you need to take a break at any
21 time, that's fine. I am just going to ask you finish
22 whatever question is pending before you do that.

23 This isn't a test of your memory
24 here today. So to the extent you don't remember
25 something, can you tell me you don't remember? If you

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1 don't remember the specific answer to a question I am
2 asking, I may ask you to give an estimate or an
3 approximation, and to the extent you can do that, I
4 would appreciate it if you would.

5 A. Okay.

6 Q. You understand that you are under oath today
7 and subject to the penalties of perjury, correct?

8 A. Yes.

9 Q. Are you taking any medications today that
10 would impair your ability to testify truthfully?

11 A. I am taking medication, but not -- I take
12 Singulair for allergies.

13 Q. Is that going to have any effect on your
14 ability to testify today?

15 A. No, just for my pet.

16 Q. Can you state for the record your full name.

17 A. Thomas Gregory Saranello.

18 Q. What is your present home address, Mr.
19 Saranello?

20 A. 5 Curve Lane, Levittown, New York, 11756.

21 Q. And what's your current business address?

22 A. 125 Broad Street, New York, New York.

23 Q. How old are you currently?

24 A. I am forty.

25 Q. Did you attend college?

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- 1 A. Yes, I did.
- 2 Q. Where did you attend?
- 3 A. Queensborough Community College.
- 4 Q. When was that?
- 5 A. Approximately '89, '90.
- 6 Q. Did you obtain some kind of degree from that
- 7 college?
- 8 A. No, I didn't finish.
- 9 Q. How many years did you do?
- 10 A. I did a year and a half and also attended
- 11 LaGuardia Community College as well.
- 12 Q. When was that?
- 13 A. That was in '97.
- 14 Q. Now, going back to Queensborough Community
- 15 College, what were you studying there, what was your
- 16 major?
- 17 A. Data processing.
- 18 Q. And between I think you said
- 19 approximately '90 was when you stopped attending there
- 20 and '97 when you were attending LaGuardia, did you
- 21 take any other courses?
- 22 A. No.
- 23 Q. And then LaGuardia, how long did you attend
- 24 LaGuardia for?
- 25 A. Approximately a year and a half as well.

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1 Q. Did you obtain any degree from there?

2 A. Just certificates on computer repair.

3 Q. What certificates did you obtain?

4 A. Just basic computer repair. I don't remember
5 exact specifics.

6 Q. Since attending LaGuardia Community College,
7 have you attended any other colleges?

8 A. No.

9 Q. Have you obtained any other certifications
10 with respect to computer repair?

11 A. Several certifications in local area
12 networking, multiple certifications in cabling and
13 fiberoptics.

14 Q. So local area networking, cabling and
15 fiberoptics.

16 And what was the other one you said?

17 A. That was it. Telecommunication
18 certifications.

19 Q. Where did you obtain the certifications?

20 A. Through vendors and through Citi itself.

21 Q. When you say Citi, you are referring to
22 CitiGroup?

23 A. Yes.

24 Q. What certifications do you currently have?

25 A. Basically what I have just told you.

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1 Q. Are there specific titles or numbers that go
2 along with any of those, that you know?

3 A. I have an ICND certification, which is a
4 Sisco interconnect certification.

5 Q. Any others you can name specifically like
6 that?

7 A. The last one was a category six cabling
8 certification from ADC, which is basically a new cable
9 plan.

10 Q. Any other post college education that you
11 have?

12 A. No.

13 Q. Before this deposition, did you speak with or
14 meet with your attorneys with respect to the
15 deposition?

16 MS. BOUCHARD: You can say whether
17 you met with us. You can't tell her anything we spoke
18 about.

19 A. Yes.

20 Q. When did you meet with them?

21 A. Yesterday.

22 Q. For how long?

23 A. Two hours.

24 Q. Did you meet with them this morning before
25 coming to the deposition?

1 A. Yes.

2 Q. For how long?

3 A. 45 minutes.

4 Q. Prior to meeting with them, did you have any
5 phone conversations to prepare for the deposition,
6 with your attorneys?

7 A. Yes.

8 Q. How many conversations?

9 A. Two or three.

10 Q. Is that over the period of the last few weeks
11 or longer period of time?

12 A. I would say about that.

13 Q. And in total, how long was the time you spent
14 on the phone?

15 A. Two hours.

16 Q. Other than your attorneys, was there anyone
17 else present during either meetings with them?

18 A. Human resources.

19 Q. From CitiGroup?

20 A. Yes.

21 Q. Who was there from human resources?

22 A. Kristen Salmon.

23 Q. Anyone else?

24 A. Ann Graves, I believe from legal.

25 Q. And during the phone conversations, was there

1 anyone else present on the phone conversations other
2 than you and your attorneys?

3 A. No, not that I know of.

4 Q. Did you review any documents to help prepare
5 for the deposition today?

6 A. Yes.

7 Q. What documents did you review?

8 A. Resume, e-mails, compliance plans, manuals.

9 Q. Anything else?

10 A. That's all I remember.

11 Q. Resume, when you refer to the resume, is that
12 Mr. Millan's resume?

13 A. Yes.

14 Q. With respect to e-mails, what specifically
15 are you referring to?

16 A. Basically just our e-mails.

17 Q. When you say our e-mails --

18 A. Between myself and Carmelo.

19 Q. I am going to ask counsel, are those the
20 e-mails that were produced yesterday?

21 MS. BOUCHARD: Yes.

22 Q. And you referenced compliance plans?

23 A. Continuity of business plans.

24 Q. Continuity of business plans. Okay.

25 Can you describe for me what those

1 are?

2 A. Continuity of business plans is a requirement
3 for any department in -- well, within technology that
4 I know of that you need to have a plan when a disaster
5 occurs, and Carmelo was the author of our continuity
6 of business plan.

7 Q. Is there another term or an abbreviated term
8 for the continuity of business plan?

9 A. COB.

10 Q. Again, I am going to ask counsel, was that
11 produced to us?

12 MS. PONTOSKI: No.

13 MS. BOUCHARD: That was not a
14 document that he reviewed with us. It was a document
15 that he reviewed.

16 MS. WALSH: I am going to request it
17 be produced to me.

18 Firstly, on the basis that the
19 allegation is Mr. Millan drafted it. So I think it's
20 relevant to the issues in the case.

21 Secondly, because it's a document he
22 reviewed in preparation for the deposition, we are
23 entitled to it.

24 BY MS. WALSH:

25 Q. You also testified that you reviewed manuals

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1 before the deposition.

2 Could you tell me what specific
3 manuals?

4 A. Process and control manual for our
5 department.

6 Q. Was it just the one manual or more than one
7 manual?

8 A. It was several versions Carmelo maintained.

9 Q. How many versions did you review?

10 A. Roughly between three and five.

11 Q. Do you know if Mr. Millan was deposed in this
12 case or if his deposition was taken?

13 A. I have no idea.

14 Q. Did you review his testimony?

15 A. No, I did not.

16 Q. Now, the e-mails you referred to, did you
17 provide those to your attorneys in response to a
18 request for those?

19 A. Yes.

20 Q. When did you do that?

21 A. Yesterday.

22 Q. When did you receive the request to do that?

23 A. I don't believe it was any formal request. I
24 just --

25 MS. BOUCHARD: I will request you

1 don't talk about anything that was exchanged between
2 attorneys.

3 Q. Did you talk to anybody at CitiGroup
4 Technologies -- withdrawn.

5 When I refer to CitiGroup
6 Technologies, is it okay if I use the term CTI?

7 A. Yes.

8 Q. Is that a term you use?

9 A. That's fine.

10 Q. What would you typically call -- refer to
11 your employer as?

12 A. CitiGroup Technology Infrastructure.

13 Q. Is it commonly referred to as CTI or no?

14 A. Yes.

15 Q. To distinguish between CitiGroup and
16 CitiGroup Technologies, Inc., I am going to refer to
17 CitiGroup Technologies, Inc., as CTI, if that's okay
18 with you.

19 A. That's fine.

20 Q. To the extent I say CitiGroup, I am referring
21 to CitiGroup, Inc.

22 A. Okay.

23 Q. Did you speak to anybody at CitiGroup
24 Technologies, other than what you already testified to
25 with respect to coming to your deposition today?

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1 A. No.

2 Q. Do you keep any kind of a file relating to
3 this lawsuit?

4 A. No.

5 Q. What's your current position at CTI?

6 A. I am project leader.

7 Q. Do you have any other title that goes along
8 with project leader?

9 A. Vice president.

10 Q. For how long have you held that position?

11 A. Past four years.

12 Q. Is there a specific department within CTI you
13 work for or division?

14 A. Metro New York site support.

15 Q. What are your duties and responsibilities in
16 that position?

17 A. To maintain network infrastructure, cabling
18 backbone, provide services, service providers for
19 MAC's, moves, adds and changes.

20 Q. Say that again.

21 A. For moves, adds and changes.

22 Q. Moves, eds and changes?

23 MS. BOUCHARD: Adds.

24 MS. WALSH: Sorry. Thanks.

25 A. And troubleshooting support.

1 Q. Moves, adds and changes are referred to as
2 MAC's?

3 A. Yes, also project builds. I guess large
4 scale moves would be part of a project or a MAC, but
5 it's larger -- it's more than a MAC. MAC's are
6 considered small, one, two person.

7 (Discussion off the record.)

8 Q. Anything else?

9 A. Compliance, tech room management and data
10 center management. That's pretty high level.

11 Q. When you say high level, what do you mean?

12 A. Pretty much the brunt of what we do is there.

13 Q. How many people do you supervise in that
14 position?

15 A. Currently thirteen.

16 Q. Do any of the thirteen you supervise
17 supervise other employees?

18 A. Yes.

19 Q. And how many would each of the thirteen -- or
20 in total, how many would the thirteen supervise?

21 A. There are two team leads under me that
22 support the six and seven people that are under me.
23 Out of the thirteen -- out of the thirteen people, one
24 of them supports, I guess, five, and the other one
25 supports five or six, something like that. I don't

1 have the exact number in my head.

2 Q. Now, at the time that you served in this
3 capacity, were you working directly with Carmelo
4 Millan?

5 A. When Carmelo was working under me, I was a
6 team leader.

7 Q. So you weren't the project leader?

8 A. No.

9 Q. Immediately prior to this position, what was
10 your role?

11 A. I was a team leader.

12 Q. For how long were you a team lead?

13 A. Three or four years.

14 Q. So if we worked backwards, you said you are
15 in your current position for approximately four years.

16 So did you start approximately the
17 beginning of 2004?

18 A. No, '98 I started, when I was a tech.

19 Q. I am referring specifically to the project
20 leader position. You indicated that you worked in
21 that position for about four years, so I am trying to
22 work back to when you started the project leader
23 position?

24 A. I am trying to think back. It's hard to
25 remember when I got the promotion to vice president

1 and when I started managing these thirteen. Roughly
2 two -- I would say 2 or 3, maybe 3 or 4, I was
3 considered a manager.

4 Prior to 2004, I was a team lead.

5 Q. When you were working as a team lead, was it
6 for the same department?

7 A. Same department -- it was a little different
8 back then, because we had more data centers at the
9 time.

10 Q. Could you testify which department you were
11 working for when you started as a team lead?

12 A. I believe it was called network integration
13 site support -- network infrastructure site support,
14 NISS, which fell under network integration.

15 Q. Was it referred to as a division, department?

16 A. Department under CGTI, I believe, at the time
17 it was called.

18 Q. It was a department of CGTI.

19 What did that stand for?

20 A. CitiGroup Technology Infrastructure.

21 Q. So this -- if you were working in that
22 position for about three or four years, would it
23 approximately have been from 2000, 2001, up through
24 2004?

25 A. Around 2000, I believe.

1 Q. Was it prior to September 11th?

2 A. The team lead position, yes.

3 Q. So at that time, CTI was referred to as CGTI?

4 A. Not that whole period of time, because we
5 didn't fully merge with Citi at the time. We were
6 Salomon Smith Barney before that. And I don't know
7 exactly when we were called CTI -- CGTI. They started
8 using that terminology after we merged with Citi Bank.

9 MS. BOUCHARD: I would like to note
10 an objection that he's not here to talk about the
11 structure of CitiGroup versus CTI as a 30(b)6 witness.
12 He can provide testimony in his individual capacity
13 but not as a 30(b)6 witness.

14 Q. At the time you worked for the network
15 infrastructure site support, and you said that fell
16 under network integration?

17 A. (Witness nods head.)

18 Q. Can you testify with respect to other
19 divisions within CTI or CGTI at the time?

20 A. As far as?

21 Q. What were the names of the other departments
22 or divisions?

23 A. I don't know. Just network integration is
24 pretty much who we rolled up to.

25 Q. How many people worked in total for network

1 integration at the time?

2 A. I don't know.

3 Q. Hundreds?

4 A. I don't know.

5 Q. Can you go through your duties and
6 responsibilities as a team lead when you started in
7 that position?

8 A. Same duties, just I had couple of more data
9 centers and less sites, less buildings under me.

10 Q. Let's start there. How many data centers did
11 you have under you?

12 A. I believe it was five.

13 Q. Where were they located?

14 A. 390 Greenwich Street, 333 West 34th Street,
15 Two Journal Square Plaza. I believe that's it.

16 Q. You said you thought you had five. That's
17 three.

18 A. There were three data centers at 390
19 Greenwich Street. I believe it was three at the time.

20 Q. At the time were you -- did you oversee the
21 data center for 388 Greenwich Street?

22 A. 388 Greenwich Street did not have a data
23 center. 388 Greenwich Street collapsed into 390
24 Greenwich.

25 Q. When you say collapsed into --

1 A. Migrated to, ran out of space, closed the
2 data center down and moved everything over.

3 Q. When was that?

4 A. I believe the migration started as early
5 as '98 and finished up in 2000 sometime.

6 Q. What is a data center?

7 A. Data center is a central point of
8 communications, from what I understand. My
9 definition, it is a distribution for voice and data
10 services, houses file servers, network routers and
11 switches and circuits.

12 Q. Is it network support?

13 A. It is not considered support. It's pretty
14 much -- it's a service we provide. We do
15 installations for other departments and work with
16 multiple teams.

17 Q. When you say installations, could you go
18 through with me the specifics of what installations
19 you provide?

20 A. Taking a server request that's submitted by a
21 system administrator, working with the engineering,
22 network engineering teams on proper placement and
23 installation, configuration of network ports,
24 submission of network changes for those network ports.
25 That's a server installation pretty much.

1 For network installations, we work
2 directly with either network engineering or network
3 integration; and work off a design provided, which we
4 QA the infrastructure portions.

5 Q. What did you say?

6 A. QA the design, work with engineering to make
7 sure their design is going to work in our environment.

8 Q. When you started as a team lead in
9 approximately 2000, how many people did you have
10 reporting to you?

11 A. I think it was five or six.

12 Q. Were you a vice president at the time --

13 A. No.

14 Q. -- or something else?

15 A. Eventually I was promoted to assistant vice
16 president, but I don't remember when.

17 Q. When you started you weren't?

18 A. No.

19 Q. What were the titles of the people reporting
20 to you?

21 A. Titles?

22 Q. Did they have a title?

23 A. Not that I remember, no.

24 Q. Prior to working as a team lead, did you have
25 another position with CTI?

1 A. Yes, I was a regular technician when I
2 started.

3 Q. Was that your first position with CTI?

4 A. Yes.

5 Q. Did you have a separate position at any time
6 with CitiGroup, Inc.?

7 A. No.

8 Q. Did you work for Salomon Smith Barney?

9 A. Yes.

10 Q. When did you start work for Salomon Smith
11 Barney?

12 A. April of '98.

13 Q. Was that after the merger of Salomon and
14 Smith Barney or before?

15 A. I don't recall when it happened. As far as
16 technology goes, it was after 2000, I believe that we
17 started to come together.

18 MS. BOUCHARD: Again, I note my
19 objection to corporate structure, which can be
20 complicated for even corporate lawyers.

21 MS. WALSH: Off the record.

22 (Discussion off the record.)

23 BY MS. WALSH:

24 Q. So you started to work for Salomon Smith
25 Barney in approximately April of '98?

1 A. Yes.

2 Q. What was your position when you first started
3 to work there?

4 A. I don't recall. I was a technician, we were
5 techs.

6 Q. In what department did you work?

7 A. I worked for the same structure as I gave you
8 before, the -- under network integration, we were the
9 network infrastructure site support, whatever it was
10 called. I don't recall. We were called
11 infrastructure at the time. That's what it was before
12 we became NISS, which was under CGTI infrastructure.

13 Q. What did you do as a technician on a
14 day-to-day basis?

15 A. On a day-to-day basis I supported all moves,
16 adds and changes.

17 Q. Before we go any further, what does that
18 mean, if you could explain in layman's terms?

19 A. That means attending meetings for move
20 relocation.

21 Q. When you say a move relocation -- can you
22 explain what that is?

23 A. They are taking 25 people from one floor and
24 moving them to another floor. Our role is to insure
25 there's network capacity, availability of ports to

1 house those users coming over, so we have to survey
2 the tech room to insure there's proper port capacity.

3 We would have to submit network
4 changes to configure those ports appropriately to
5 however those users are relocating as far as speed
6 duplex and VLAN goes.

7 If capacity was needed, we needed to
8 engage the network integration team to either supply
9 us with a line card for additional capacity, or if we
10 had one on our own, we would install it ourselves and
11 handle the configurations.

12 Then we handled the physical wiring
13 from the tech room out to the desktops, which would
14 include network testing, once all the wiring was
15 complete, and insure we established a session.

16 Q. I want to review this in more specific
17 detail. So if you had 25 people who were moving from
18 one floor to another floor, you said you would have to
19 determine the network capacity, is that correct?

20 A. (Witness nods head.)

21 Q. Explain what that means, how would you
22 determine network capacity?

23 A. If a switch, a network switch, had at that
24 time 24 port cards in it, and you were able to put in
25 up to 11 cards on that switch, so you would have 24

1 times 11. At times there were less cards in the
2 switch, that you know you wouldn't be able to support
3 the room unless you added a card because the capacity
4 was filled.

5 Certain people have two or three
6 machines at their desks. Other people had one machine
7 at their desk. So depending on the capacity of the
8 floor, you needed to be the judge of that.

9 Q. So to determine the network capacity
10 physically, what that meant was going to some central
11 location and checking to see how many port cards were
12 there and how many were filled?

13 A. Absolutely. And we also managed databases
14 that house that information. So we would take the
15 database pretty much at a glance and then bring that
16 database with us to those tech rooms to do physical
17 inventory.

18 Q. When you say you physically took a database,
19 what --

20 A. We have snapshots pretty much of what the
21 switch looks like in a database. But when you have
22 fifty floors or forty floors you manage, those
23 databases may be inaccurate at times. They are, they
24 aren't, but it's used as a guide to go and do your
25 survey. It helps having a database.

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1 Q. So explain to me specifically what the
2 database shows you and how physically it -- are you
3 looking at a computer screen, are you looking at
4 something different?

5 A. It's either an Excel or Access at the time,
6 and it pretty much shows you port for port, line by
7 line, the desktop where it's connected to on that
8 switch port.

9 We had to physically layer in a
10 database.

11 Q. You have some kind of spreadsheet
12 essentially --

13 A. Yes.

14 Q. -- which shows --

15 A. -- a mirror of what the switch looks like.

16 (Discussion held off the record.)

17 Q. Let's take a step back, so I am clear with
18 respect to a few things.

19 The first thing you need to do, you
20 need to physically go look at the ports, at a specific
21 location.

22 Is it a piece of hardware you are
23 looking at?

24 A. Yes.

25 Q. What size is that piece of hardware?

1 A. 19 inches wide by 30 inches high, I would
2 say.

3 Q. What is the hardware referred to as?

4 A. Cisco switch.

5 Q. Would there on a floor with 25 people --
6 let's say you are doing a 25 person move, how many of
7 those Cisco switches would there be or equivalent of
8 that?

9 A. There would be one on each side of the floor,
10 pretty much.

11 Q. Is there a specific number of Cisco switches
12 that can service a specific number of desks, is that
13 how it goes?

14 A. Yes, absolutely.

15 Q. What typically would a single Cisco switch,
16 how many desks would that service?

17 A. 24 times 11, which is, I guess -- what is
18 that?

19 Q. 264?

20 A. Whatever it is.

21 Q. Is that 264 desks or --

22 A. 264 physical ports.

23 Q. So if someone has three monitors on their
24 desk or different pieces of equipment, they might be
25 taking up four of those ports or more of those ports?

1 A. Yes.

2 Q. Typically one person at a desk at that time,
3 how many ports would they be taking up?

4 A. Depending on the business they were, it would
5 be either one, two, or three, could be as much as four
6 if they were a technology business.

7 Q. One to four?

8 A. Yes.

9 Q. So you would go and you would look at the
10 Sisco switch, you would look at the number of ports,
11 you would make a count of how many ports were being
12 used, and you would record that information somewhere?

13 A. We go by our database. We take our database,
14 which is whatever it showed us, and we would match it
15 to the switch, and install conductivity where we
16 needed to, remove conductivity if needed. You are
17 managing capacity.

18 Q. And when you say managing capacity, explain
19 to me what you mean.

20 A. Managing capacity is having control of your
21 network switch and your capacity pretty much. It's --
22 if you had a business that was in a corner and they
23 took up fifty ports, and now you are moving a business
24 in that only needs one connection per your downsizing
25 to 25 ports, you are taking those ports back and now

1 you have the additional capacity if anyone else moves
2 in.

3 It's pretty much being proactive so
4 that you don't always have to purchase a card.

5 Q. And when you say removing ports, you are
6 actually removing the piece of hardware?

7 A. Removing cables pretty much.

8 Q. Is a port a cable?

9 A. No.

10 Q. Or a cable connects to a port?

11 A. A cable connects to a port.

12 Q. So when you say removing ports, in addition
13 to removing the cable, are you actually removing
14 something else?

15 A. You are reclaiming ports. You are removing
16 cables.

17 Q. The port stays there?

18 A. Yes.

19 Q. The cable is removed?

20 A. Yes.

21 Q. So when you are moving people, presumably you
22 are taking away the conductivity, you are ending the
23 connectivity to the network?

24 A. Yes.

25 Q. That's the first step of it?

1 A. Yes.

2 Q. In addition to actually taking out the
3 cables, what else is physically involved in removing
4 that connectivity?

5 A. Logically you need to shut down that port.
6 You are not supposed to have a port that has nothing
7 plugged into it. It's not supposed to be live. So
8 that port needs to be disabled. We would submit
9 network changes to make that happen.

10 Q. So essentially you have to shut down the
11 port, and you said you have to submit network changes
12 to do that?

13 A. Yes.

14 Q. What does that mean physically, how do you
15 submit a network change, who do you submit it to?

16 A. Physically it's called a layer two MAC
17 request that is sent to network control. At the time
18 we had access to switches prior to -- I don't remember
19 which year it was, but before the MAC requests, we
20 were able to shut down ports on our own pretty much.
21 We had privileges to logically telnet to a switch,
22 which means from a computer you could log into a
23 switch, look at the ports, and figure out what you
24 need to configure. We were able to do that.

25 Q. You were able to go onto a computer and turn

1 off, through the computer, turn off the live feeds to
2 the port?

3 A. Yes.

4 Q. And that was -- you weren't allowed to do
5 that at some point?

6 A. At some point we were -- our write access was
7 taken away for compliance reasons, so the network
8 control group was the only group allowed to make the
9 changes going forward.

10 They set up a layer two MAC system
11 for us, which still meant we managed the capacity.
12 And we submitted the actual changes that the control
13 group had to make, pretty much typing up everything
14 for them, and then they would execute the change.

15 Q. You created some kind of spreadsheet or other
16 document, and you submitted either by e-mail or
17 physical piece of paper a request to that department?

18 A. No, it's an actual system. It was an actual
19 system, layer two MAC system.

20 Q. Does that mean you are going into a computer
21 and doing it on a computer?

22 A. Virtual, yes.

23 Q. So you go into the computer, you enter the
24 information, you make the request, it goes to somebody
25 else, and somebody else is actually in charge of

1 switching off the live connection?

2 A. Yes.

3 Q. So essentially you are making the request,
4 whereas before you were actually switching off the
5 connection yourself?

6 A. Yes.

7 Q. You said the reason it was changed to that
8 system was for compliance --

9 A. Yes.

10 Q. -- issues?

11 A. Yes.

12 Q. Why was that?

13 A. I don't really know.

14 Q. Was that change implemented when you were
15 still a technician?

16 A. No. It was, I believe, around 2003.

17 Q. You were a team lead at that point?

18 A. Yes.

19 Q. So up to 2003, part of that process of what
20 we are going through here with moving was actually
21 disconnecting or turning off the live feed to the
22 port?

23 A. Yes, and also configurations of the port,
24 virtual LAN configurations to the port.

25 Q. Explain what you mean by that.

1 A. Virtual LAN is attached to a network segment
2 where that segment can hold 255 devices on. We need
3 to make sure that we don't exceed that limit. And you
4 also need to understand how the VLAN works and how it
5 matches up to that address. So each network has a
6 virtual LAN number associated with it.

7 Q. What would you physically do with respect to
8 working out the configurations for the port, what was
9 physically involved?

10 MS. BOUCHARD: I am making a
11 standing objection. You have been using the word
12 physical a lot. Do you mean body motions, or do you
13 mean --

14 MS. WALSH: Yes. Physically did you
15 have to go and remove something, did you have to
16 create a document, did you have to put in a request,
17 physically what did you do?

18 A. Physically you would have to telnet to the
19 switch.

20 Q. What does that mean, how do you telnet to the
21 switch?

22 A. From a computer. Once you verify the port
23 you are going to be touching, you telnet to the
24 switch, establish a session from a computer, from a
25 telnet prompt. Then you would connect to that switch

1 via IP address.

2 Q. What was the purpose of doing that?

3 A. To turn the port on or off and to change the
4 VLAN if necessary.

5 Q. Why would you have to change the VLAN?

6 A. If the other VLAN is full and if it has a
7 second VLAN on it, that's why the VLAN would need to
8 be changed.

9 Q. So you would have to determine if the VLAN
10 was full?

11 A. Yes.

12 Q. How would you do that?

13 A. By telnetting through the router to see how
14 many addresses are actually being used.

15 Q. Is there a number, is there a maximum
16 capacity that a VLAN has?

17 A. It depends on how the VLAN's are structured.
18 It's all -- it's the way it's designed from
19 engineering, whether it's 255 addresses, whether 125
20 addresses, it's laid out according to how the floor is
21 designed.

22 Q. Who determines that?

23 A. Network engineering.

24 Q. You don't have any input into that?

25 A. Absolutely we do.

1 Q. What's your input?

2 A. If it's a new build-out. I don't want to get
3 away from a move. A move is 25 people going from here
4 to there, insuring capacity and making the
5 configuration changes you need, and add the additional
6 cabling.

7 If we are building out a new floor,
8 where we are adding new switches, we absolutely have
9 the input.

10 Q. What input do you have?

11 A. We work with engineering and pretty much give
12 them the amount of people that are going to be
13 occupying the floor, what type of business it is, to
14 determine the capacity.

15 Q. What impact does the type of business have on
16 determining the capacity?

17 A. If it's trading, it could be, you know, for
18 our five connections per desk. If it's back office,
19 it will be one.

20 Q. It's determining how many connections each
21 person would have to have potentially?

22 A. Yes.

23 Q. And communicating that to --

24 A. Depending on -- it's very important to
25 determine what you need to purchase, because the

1 equipment is very expensive.

2 Q. So we talked about your input with -- I'm
3 sorry, what did you -- network engineering, right?

4 A. Yes.

5 Q. Your input to network engineering would be
6 able to communicate to them the number of people on
7 the floor, and the number of devices that each of
8 those people would have?

9 A. We would have input on it.

10 Q. Is that your input?

11 A. That's some of our input.

12 Q. Go through the rest of your input.

13 A. The other input is depending on what type of
14 network equipment is being purchased.

15 Q. What's your input with respect to that?

16 A. Whether our cable plant can handle what's
17 being ordered, the proper --

18 Q. Your cable plan or plant?

19 A. Plant. Pretty much determining the distance
20 between the end point router and where the local
21 switch is going to be placed.

22 That's something that engineering
23 cannot determine without us pretty much measuring and
24 putting a tester on that infrastructure and telling
25 them this distance is too great, you shouldn't be

1 ordering this part, you should be ordering this part.

2 So that's part of our QA for a new
3 build of a network switch.

4 Q. To review that again, you would need to
5 determine the distance between the end point router?

6 A. Yes.

7 Q. What's the end point router?

8 A. That's where the switch connects to. That's
9 pretty much where the network starts.

10 Q. The end point router is the starting point
11 for the network?

12 A. Yes.

13 Q. You have to determine the distance between
14 the end point router and what else?

15 A. And the local switch, layer two switch.

16 Q. What is that?

17 A. That's the switch that's going in a tech room
18 to support the end users.

19 Q. That switch is in the tech room?

20 A. Yes.

21 Q. Where is the tech room, or where would it be
22 in relation to --

23 A. On a user floor.

24 Q. On a user floor?

25 A. Yes.

1 Q. What is a user floor?

2 A. Where the offices are and the people sit. It
3 would be local to the floor.

4 Q. So every floor --

5 A. A router would be in a data center.

6 Q. Every floor that's a user floor has one of
7 these tech centers?

8 A. Tech rooms.

9 Q. That involved you physically measuring the
10 distance between the end point router?

11 A. It would be with a network tester.

12 Q. Explain that to me, how would you do that?

13 A. We would wire up fiberoptic cable between the
14 end point router and the location where the proposed
15 switch would be going. And we would put a
16 microscanner on it, microtest, and that would give us
17 the distance; or we could do it via copper riser with
18 a cable tester, that would also give us the distance,
19 and that helps engineering make their determination
20 whether to use an SXG BIC or LXG BIC.

21 Q. Engineering makes that determination?

22 MS. PONTOSKI: Objection.

23 Q. Was it based on the information you gave
24 them?

25 A. Yes. It's a collaborative effort.

1 Q. You referred to the microscanner, is that
2 something you physically connect?

3 A. Yes.

4 Q. Describe it for me.

5 A. It's a tester that goes through all the
6 parameters of a cable, whether it's good or not. It's
7 a cable tester that used to test network cabling.

8 Q. What do you actually hook it up to?

9 A. Cable, Ethernet cable or unshielded twisted
10 pair.

11 Q. Where is the cable, under the floor, behind
12 the walls, is it evident on the user floor, where is
13 it?

14 A. The cable is not a direct connection, so we
15 have to install interconnectivity between multiple
16 junctions.

17 Largely a tech room may, on a
18 drawing, may say this tech room connects to this data
19 center, but physically there could be multiple pieces
20 of cable that we have to tie together to get from one
21 point to another.

22 You need to have a good
23 understanding of cable plant to carry out those
24 interconnect.

25 Q. What is cable plant?

1 A. Cable plant is premises wiring. It's a
2 combination of fiberoptic and copper cable wiring.

3 Q. Where did you develop your knowledge of cable
4 plant?

5 A. I started out in an assembly house when
6 network cabling was becoming very popular. So I have
7 an understanding of how to assemble cables and how to
8 get devices to talk to each other through multiple
9 types of media.

10 Q. When you started to work for Salomon Smith
11 Barney, was there a training program you went through
12 as a technician?

13 A. Training program, no.

14 Q. Did you receive any on-the-job training at
15 Salomon Smith Barney?

16 A. Yes.

17 Q. When was that?

18 A. Cable certifications that I gave you earlier.

19 Q. You took cable certifications while you
20 worked for Salomon Smith Barney?

21 A. Yes.

22 Q. Were they a requirement for your job?

23 A. I don't know.

24 Q. Were there technicians who worked with you
25 that didn't have those certifications --

1 MS. PONTOSKI: Objection to the form
2 of the question.

3 Q. -- back when you started at Salomon Smith
4 Barney?

5 A. What was the question?

6 Q. Were there technicians working with you when
7 you got your certifications, were there technicians
8 working with you who didn't have their certifications?

9 A. I don't know.

10 Q. To get back to what you described as doing
11 the network testing to determine the appropriate
12 distance between the local switch and tech room, the
13 microscanner you actually connect to a cable, is it
14 one connection that determines it or multiple
15 connections to multiple cables?

16 A. You have to interconnect multiple cables.
17 You have to have an understanding of the cable plant
18 from how to go from one piece to another piece, make
19 sure, if it's an eight wire connection, all your wires
20 come out end to end the same way, so you can get an
21 accurate reading.

22 Q. Do you put the microscanner on each different
23 part of the cable, or you do all that connection first
24 and then you put the microscanner on to make sure it's
25 correct?